

11-21-05

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FILED

NOV 09 2005

Phil Lombardi, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LISA JEANINE FINDLEY a/k/a

LISA JEANINE SULLINS,

Defendant.

05 CR 155 TCK

INDICTMENT

[18 U.S.C. § 1014: False Statement to
Obtain a Bank Loan; 18 U.S.C. §
1344(1): Bank Fraud]

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 1014]

On or about May 29, 2002, in the Northern District of Oklahoma, LISA JEANINE FINDLEY a/k/a Lisa Jeanine Sullins, defendant herein, knowingly did make a materially false statement in an application for a residential property loan for \$25,336.32, submitted by LISA JEANINE FINDLEY on said date to Arvest Bank, Tulsa, Oklahoma, the accounts of which were then insured by the Federal Deposit Insurance Corporation, for the purpose of influencing the action of said bank to approve said loan, in that LISA JEANINE FINDLEY utilized the social security number of xxx-xx-0124, whereas in truth and in fact, as LISA JEANINE FINDLEY then and there well knew, that was not her correct social security number, in violation of Title 18, United States Code, Section 1014.

COUNT TWO

[18 U.S.C. § 1014]

On or about May 30, 2002, in the Northern District of Oklahoma, LISA JEANINE FINDLEY a/k/a Lisa Jeanine Sullins, defendant herein, knowingly did make a material false statement in an application for a residential real estate loan for \$33,463.65, submitted by LISA JEANINE FINDLEY on said date to Arvest Bank, Tulsa, Oklahoma, the accounts of which were then insured by the Federal Deposit Insurance Corporation, for the purpose of influencing the action of said bank to approve said loan, in that LISA JEANINE FINDLEY utilized social security number xxx-xx-0124, whereas in truth and in fact, as LISA JEANINE FINDLEY then and there well knew, that was not her correct social security number, in violation of Title 18, United States Code, Section 1014.

COUNT THREE

[18 U.S.C. § 1014]

On or about October 27, 2004, in the Northern District of Oklahoma, LISA JEANINE FINDLEY a/k/a Lisa Jeanine Sullins, defendant herein, knowingly did make a materially false statement in an application for a loan for \$121,734.21, submitted by LISA JEANINE FINDLEY on said date to Arkansas Valley Bank, 9800 East 51st Street, Tulsa, Oklahoma, the accounts of which were then insured by the Federal Deposit Insurance Corporation, for the purpose of influencing the action of said bank to approve said loan, in that LISA JEANINE FINDLEY utilized the social security number xxx-xx-0114, whereas in truth and in fact, as LISA JEANINE FINDLEY then and there well knew, that was not her correct social security number, in violation of Title 18, United States Code, Section 1014.

COUNT FOUR

[18 U.S.C. § 1344(1)]

From on or about May 15, 2003, to on or about May 19, 2003, in the Northern District of Oklahoma, LISA JEANINE FINDLEY a/k/a Lisa Jeanine Sullins, defendant herein, did knowingly execute, and did attempt to execute, a scheme and artifice to defraud Arvest Bank ("Arvest"), Tulsa, Oklahoma, a federally insured financial institution as defined in Title 18, United States Code, Section 20, by depositing into her account at Arvest four counterfeit bank checks drawn on the account of Maplewood Care Center, 16 Norcross Street, Suite 50-B, Roswell, Georgia at the Bank of North Georgia. The checks are more specifically described as follows:

Date of Deposit	Date of Check	Check Number	Payee	Amount of Check
05/15/03	04/30/03	210493	ON-Call Family Medical	\$1,746.35
05/15/03	05/05/03	210494	ON-Call Family Medical	856.72
05/15/03	05/12/03	210495	ON-Call Family Medical	980.50
05/15/03	05/15/03	210496	ON-Call Family Medical	1,875.22
TOTAL DEPOSIT				5,458.79

Defendant LISA JEANINE FINDLEY knew the checks were counterfeit and would not be paid by the financial institution upon which they were drawn. She deposited them into her Arvest account to fraudulently create false credit balances in her account at Arvest, and she wrote checks drawn upon or withdrew cash from that account at Arvest, based upon the falsely inflated credit balances, before Arvest learned that the four deposited checks would not be paid by the financial institution upon which they were drawn. All in violation of Title 18, United States Code, Section 1344(1).

COUNT FIVE

[18 U.S.C. § 1344(1)]

From on or about June 6, 2003, to on or about June 30, 2003, in the Northern District of Oklahoma, LISA JEANINE FINDLEY a/k/a Lisa Jeanine Sullins, defendant herein, did knowingly execute, and did attempt to execute, a scheme and artifice to defraud Arvest Bank ("Arvest"), Tulsa, Oklahoma, a federally insured financial institution as defined in Title 18, United States Code, Section 20, by depositing into her account at Arvest four counterfeit bank checks drawn on the account of Maplewood Care Center, 16 Norcross Street, Suite 50-B, Roswell, Georgia at the Bank of North Georgia. The checks are more specifically described as follows:

Date of Deposit	Date of Check	Check Number	Payee	Amount of Check
06/06/03	05/28/03	210499	OCFM	862.13
06/06/03	05/28/03	210500	OCFM	678.32
06/06/03	05/28/03	210501	OCFM	431.69
06/06/03	06/02/03	210504	OCFM	949.38
TOTAL DEPOSIT				2,921.52

Defendant LISA JEANINE FINDLEY knew the checks were counterfeit and would not be paid by the financial institution upon which they were drawn. She deposited them into her Arvest account to fraudulently create false credit balances in her account at Arvest, and she wrote checks drawn upon or withdrew cash from that account at Arvest, based upon the falsely inflated credit balances, before Arvest learned that the four deposited checks would not be paid by the financial institution upon which they were drawn. All in violation of Title 18, United States Code, Section 1344(1).

A TRUE BILL

DAVID E. O'MEILIA

United States Attorney

A handwritten signature in cursive script, reading "Charles M. McLoughlin", written over a horizontal line.

Charles M. McLoughlin

Assistant United States Attorney

s/Grand Jury Foreman

Foreman